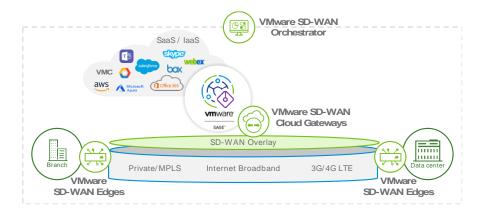
# **VMware SD-WAN Privacy Datasheet**

## How VMware SD-WAN brings value to you

VMware SD-WAN<sup>™</sup> is a part of the VMware secure access service edge (SASE) platform, which offers converged cloud networking and security services to achieve flexibility, agility, and scale for enterprises of all sizes. As a cloud-delivered solution, VMware SD-WAN helps ensure resilient WAN connectivity and allows users to have flexible WAN choices, such as broadband, MPLS, and LTE. VMware SD-WAN offers a high-quality user experience for cloud hosted applications and services while enabling lower networking costs.



VMware SD-WAN Edges connect enterprise branches or other distributed locations to the SD-WAN network leveraging any type of WAN connectivity transport. VMware SD-WAN Gateways, unique to the VMware SD-WAN cloud infrastructure, are strategically deployed and highly available across the globe. These cloud Gateways provide an optimized onramp to cloud services, carrying out reliability and performance enhancements such as jitter buffering and packet-loss remediation based on the traffic's envelope data as the encrypted traffic passes through the Gateway without adding inefficiency of the network hairpin effect. The VMware SD-WAN Edges are managed and monitored by the cloud-hosted VMware SD-WAN Orchestrator, which is the central management system from which customer's IT administrators can configure and deploy SD-WAN services.

For more information, see the VMware SD-WAN Service Description.

## VMware and Privacy

In a complex world of data and the digital era our goal is simple: at VMware, you, our customers, and your data are our primary concern. VMware takes privacy and data protection very seriously and is committed to providing clear information about how we collect, use and process your personal data. We have established policies and practices designed to protect the personal data we process on behalf of our customers (as a processor), and as a controller. We are also committed to privacy-by-design when designing our products and services and VMware's Privacy Team works with the development teams to identify and embed privacy controls for customers.

#### ABOUT VMWARE SD-WAN

VMware SD-WAN simplifies branch WAN networking by automating deployment and improving performance over private, broadband Internet and LTE links for today's increasingly distributed enterprises. VMware SD-WAN includes: a choice of public, private or hybrid cloud network for enterprise-grade connection to cloud and enterprise applications; branch office enterprise appliances and optional data center appliances; software-defined control and automation; and virtual services delivery.

Learn more at: www.sase.vmware.com

#### ABOUT VMWARE'S PRIVACY PROGRAM

- Cloud Trust Center At VMware, we want to bring transparency that underlies trust. *The VMware Cloud Trust Center* is the primary vehicle to bring you that information.
- Data Privacy Officer Please contact VMware's Privacy Team at *privacy@vmware.com* or by mail at Office of the General Counsel of VMware, Inc., 3401 Hillview Ave, Palo Alto, California, 94304, USA.

## SECURITY, CERTIFICATIONS AND THIRD-PARTY ATTESTATIONS

• All compliance certifications are available in the VMware Cloud Trust Center's Compliance Page. The personal data collected and processed by VMware are largely dependent on the type of offering you purchase. This Privacy Datasheet provides you with information about how VMware processes your personal data in connection with the VMware SD-WAN Service Offering.

## Types of Data Collected by VMware SD-WAN

The VMware SD-WAN Edges are managed and monitored by the cloud-hosted VMware SD-WAN Orchestrator. The VMware SD-WAN Orchestrator collects envelope metadata directly from the VMware SD-WAN Edges, including flow statistics (source and destination IP address, source client hostname, source MAC address, network ID, partition ID, Edge ID, enterprise ID, link ID, gateway IP, transport protocol, destination port, destination FQDN, destination domain, application, and application category) and link statistics (ISP name, Public IP address, bandwidth, latency, packet loss and jitter). No network payload information from your network traffic is sent to or stored on the VMware SD-WAN Orchestrator, nor is it stored on VMware SD-WAN Gateways. VMware does not have any visibility into the payload information from your network traffic.

SD-WAN is managed by your administrators. Upon account set-up, your initial administrator receives a username and password, and they are the ones who can generate other accounts for your other administrators. Personal data is collected upon creation of an administrator's account as noted in the chart below. The email address is used as a user ID to identify the administrator and associate a password in order to authenticate access to the VMware SD-WAN Orchestrator, for role-based access controls and for event logs. Optionally, the email address can be used to receive automated alert messages of network service disruptions. Similarly, administrators have the option to enter mobile phone numbers for receiving automated text alerts of network service disruptions. Mobile phone numbers may also be used for authentication purposes.

In connection with the customer's use and VMware's provision of the Service Offering, VMware collects and further processes data as classified below. In some instances, personal data may be included in such data.

VMware Data	Description and Purpose of processing	Categories of Personal Data
Classification		
Customer	Content submitted by customer to the	Generally, the customer controls
Content	Service Offering for processing, storage,	and determines which type of
	or hosting (described as "Your Content"	personal data it submits to the
	in VMware's Terms of Service). To the	Service Offering. The specific
	extent the Service Offering processes	personal data processed will
	Customer Content, VMware processes	depend on the customer's specific
	such Content to provide the Service.	configurations and deployment.
		Customers do not submit
		workload/payload data to the SD-
		WAN Service Offering.

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Support Request	Data provided by customer to VMware	Any personal data the customer
Content	to address a technical support issue.	shares with VMware in connection
		with a support request (as
		controlled and determined by
		customer).
Account Data	Data collected and used by VMware to	Contact Information, such as name,
	manage the customer account and	email address, address and phone
	maintain the relationship with	number of customer employees involved in the purchase of the Service
	customer, such as to bill the customer or deliver notifications and alerts.	Offering.
		Online Identifiers such as
		administrator's IP address or login
		username.
Service	Data used by VMware to facilitate the	Contact Information, such as
Operations Data	delivery of the service. This may include	administrators' email address.
	(i) tracking entitlements, (ii) providing	Online Identifiers such as
	support, (iii) monitoring the	administrators' and developers' IP
	performance, integrity, and stability of	address, login username or login time
	the Service's infrastructure, and (iv)	stamps.
	preventing or addressing Service or	
	technical issues. For example:	
	Configuration, usage and	
	performance data	
	Authentication Data	
	Service logs, security logs,	
	and diagnostic data	
	<ul> <li>Survey and feedback data</li> </ul>	
Service Usage	Information used by VMware for	Contact Information, such as
Data	analytics, product improvement	administrators' email address (e.g. to
	purposes, and proactive support. See	provide proactive support).
	here for additional details regarding	Online Identifiers such as
	VMware's Service Usage Data Program	administrators' IP address.
	(SUDP). For example: Configuration,	
	usage and performance data.	

## How We Process and Protect Data as a Controller

To the extent VMware acts as the controller, the following privacy notices explain how VMware collects, uses and protects any personal data included in the above categories of data:

*VMware Privacy Notice:* This notice addresses the personal information we collect when you purchase VMware products and services and provide account-related personal information.

*VMware Products and Services Privacy Notice:* This notice applies only to the limited personal information we collect and use for our own purposes in connection with our provision of VMware products and services, including (i) any cookies and similar tracking technologies we may use when providing the products or services; (ii) any information we use to facilitate the delivery of VMware services; and (iii) any data we collect to improve our products and services and our customer's experience.

## How We Process and Protect Data as a Processor

In connection with the provisioning of the Service Offering, VMware will process personal data contained in Customer Content on behalf of the customer. In the case of VMware SD-WAN, depending on the settings you select, Customer Content includes flow statistics (source and destination IP address, source client hostname, source MAC address, network ID, partition ID, Edge ID, enterprise ID, link ID, gateway IP, transport protocol, destination port, destination FQDN, destination domain, application, and application category) and link statistics (ISP name, Public IP address, bandwidth, latency, packet loss and jitter). With respect to personal data included in Customer Content, VMware is acting as a "processor" (acts on the instruction of the controller), while the customer has the role of the "controller" (determines the purposes of the processing).

### **Data Protection Addendum**

VMware's obligations and commitments as a data processor are set forth in VMware's *Data Processing Addendum* ("DPA"). VMware will process personal data contained within Customer Content in accordance with the applicable agreement and the DPA. The applicable agreements for VMware SD-WAN, including the VMware Terms of Service and the VMware SD-WAN Service Description, can be found *here*.

### Data Storage and Cross-Border Data Transfers

VMware SD-WAN enables customers to choose the data center location of the data collected by the Service Offering and stored on the SD-WAN Orchestrator. This location is selected at service instantiation and choices include the United States, Canada, Singapore, France, Germany, India and Australia. Backups of the data, used to provide disaster recovery capabilities, are kept in the same region. For traffic routed through the VMware SD-WAN Service Offering, the Service Offering leverages the closest Gateway to the originating Edge device. The Gateways operate as conduits and do not store data for more than 5 minutes. Hosting location options and Gateways are added from time to time so please visit the *Sub-Processors list* for up-to-date location details.

#### DATA PRIVACY REQUESTS

If you wish to exercise any of your rights under applicable data privacy laws for personal data processed by your organization while using the Service Offering, please contact your organization. See VMware's Privacy Notice for information about how to exercise your rights where VMware is processing personal data in connection with its business operations.

## FOR MORE INFORMATION OR TO PURCHASE VMWARE PRODUCTS

Contact your VMware account representative or call 877-4-VMWARE (outside North America, +1-650-427-5000), visit *vmware.com/products*, or search online for an authorized reseller.

#### UPDATES

Reading from a PDF? Don't be outdated, be informed! Find the latest information in the current version of this document from the *VMware Cloud Trust Center's Privacy Page*. For cross-border personal data transfers from the EEA, Switzerland and the UK, VMware relies on Binding Corporate Rules ("BCR") as a processor. You can view VMware's BCR's in the VMware Cloud Trust Center.

### Sharing with Sub-Processors

For the Service Offering, VMware utilizes third-party companies to provide certain services on its behalf. As set forth in the *Data Processing Addendum*, VMware has agreements and data transfer mechanisms in place with each sub-processor. A list of sub-processors for VMware SD-WAN is available *here*.

Additional sub-processors involved in providing technical support services for the VMware Service Offerings are listed in the *Support Services Sub-Processer List*.

VMware also provides customers with an easy mechanism to monitor changes to our list of subprocessors. If you would like to receive notifications, please visit this page *here*.

#### **Data Retention and Deletion Practices**

VMware retains personal data that we may collect in connection with the customer's use of the Service Offering for as long as it is needed to fulfill the obligations of the VMware Terms of Service.

The *VMware Data Processing Addendum* and the relevant *Service Description* set forth how personal data contained in Customer Content is deleted after contract expiration or termination. VMware advises you to retrieve any data you wish to retain before the account termination takes place.

During the subscription term, Customer Content transmitted to the VMware SD-WAN Orchestrator will be retained and available for querying and alerts for at least twelve months (by default) from the date and time the data point was originally ingested into the Service Offering. Back-ups of the Orchestrator, which are made frequently, are overwritten at least every three months. Once envelope data is sent from the VMware SD-WAN Edge to the Orchestrator, that data is deleted from the VMware SD-WAN Edge. The payloads passing through the VMware SD-WAN Gateways are processed in memory and are not retained for more than a few minutes.

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